

Date: Wed, 15 Jun 2022 18:16:46 +0000  
From: FedRAMP <[info@fedramp.gov](mailto:info@fedramp.gov)>  
Reply-To: FedRAMP <[info@fedramp.gov](mailto:info@fedramp.gov)>  
To: William Hamilton - XAAB <[william.hamilton@gsa.gov](mailto:william.hamilton@gsa.gov)>  
Message-ID: <E2YW7WOY6KD\_62aa220e40645\_333fc68e8cb95c84684\_sprut@zendesk.com>  
Subject: [Request received] Action Needed MBL Technologies Formal Complaint Notice  
X-Source-Folder: GSA-2022-001178--william.hamilton@gsa.gov\_0  
X-Email-Hash-MD5: 2779c73360aef62bea1e63fc925755d1

##- Please type your reply above this line -##  
  
Your request (65036) has been received and is being reviewed by the FedRAMP support staff.  
  
To add additional comments, reply to this email.



**William Hamilton – XAAB (FedRAMP)**  
Jun 15, 2022, 1:16 PM GMT–5

(b) (6) –

After reviewing MBL Technologies’ security assessment report (SAR) for Issio Information System, the FedRAMP PMO identified several fundamental testing accuracy and completeness issues associated with the assessment. Additionally, it was confirmed by A2LA that the assessors utilized for this assessment do not meet the personnel requirements specified in the [A2LA R311 - Specific Requirements: Federal Risk and Authorization Management Program \(FedRAMP\)](#). Please see the enclosed letter for more information related to these concerns.

Based on the severity of the issues noted above and, in accordance with [FedRAMP’s 3PAO Obligations and Performance Standards](#), your FedRAMP recognition status is now “In-Remediation” and will be noted as such on your FedRAMP Marketplace page. Please consider this a formal complaint that needs to be addressed with your quality system. Within 10 business days of this notification, a written formal corrective action plan (CAP) response must be provided both the FedRAMP PMO and A2LA (via [info@fedramp.gov](mailto:info@fedramp.gov) and [fedramp@a2la.org](mailto:fedramp@a2la.org)) that identifies the root cause, how and when the deficiencies will be remediated, and actions that will be taken to correct these issues. At a minimum, all corrective actions must occur and be approved by the FedRAMP PMO prior to the submission of any new assessment deliverables to the FedRAMP PMO.

If MBL Technologies fails to complete the formal CAP, your organization’s FedRAMP recognition status will be removed from the FedRAMP Marketplace. In some cases resolution may require a re-assessment by A2LA for validation of the successful completion of the CAP, as determined by FedRAMP.

Please don’t hesitate to reach out if you have any further questions.

Thank You –  
--  
John Hamilton  
FedRAMP Program Manager of Security Operat ons  
Technology Transformat on Service | GSA  
(b) (6) | [william.hamilton@gsa.gov](mailto:william.hamilton@gsa.gov)

Attachment(s)  
[MBL Technologies Formal Complaint Letter – Issio Assessment Concerns\\_061522.pdf](#)

You are an agent. Add a comment by replying to this email or [view ticket in Zendesk Support](#)

**Ticket #** 65036  
**Status** New  
**Requester** William Hamilton – XAAB  
**CCs** (b) (6), Brian Conrad – QXC, Bibi Abdullah, FedRAMP, (b) (6)  
**Group** –  
**Assignee** –  
**Priority** –  
**Type** Ticket  
**Channel** By Mail

This email is a service from FedRAMP. Delivered by [Zendesk](#)

From: (b) (6) (b) (6) @mbitechnologies.com>  
To: John Hamilton <william.hamilton@gsa.gov>, FedRAMP <FedRAMP@mbitechnologies.com>  
CC: Brian Conrad - QQC <brian.conrad@gsa.gov>, (b) (6) (b) (6) a2la.org>, Bibi Abdullah <babdullah@a2la.org>, info fedramp <info@fedramp.gov>, (b) (6) (b) (6) mbitechnologies.com>  
Subject: RE [External] Action Needed MBL Technologies Formal Complaint Notice  
Date: Wed, 15 Jun 2022 18:47:33 +0000  
Message-ID: <DS0PR19MB647951E2C7D1A4F06F952D6FF8AD9@DS0PR19MB6479.namprd19.prod.outlook.com>  
X-Source-Folder: GSA-2022-001178-william.hamilton@gsa.gov\_0  
X-Email-Hash-MD5: 45548196ced36868407e25da79477e0c

Good afternoon

This has been received. Before we respond, I would like to confirm that this is referencing the SAR that was sent to the PMO November 12, 2020? If so, this was performed well before the A2LA Personnel requirements change which were announced in the updated R311 dated October 12, 2021.

We would like to set up a call to discuss this. We are concerned we are being penalized because the PMO is upholding current standards to an assessment that was performed in 2020. Please advise us of your schedule.

Regards,

(b) (6)

---

From: John Hamilton <william.hamilton@gsa.gov>  
Sent: Wednesday, June 15, 2022 2:16 PM  
To: (b) (6) mbitechnologies.com>; FedRAMP <FedRAMP@mbitechnologies.com>  
Cc: Brian Conrad - QQC <brian.conrad@gsa.gov>; (b) (6) (b) (6) a2la.org>; Bibi Abdullah <babdullah@a2la.org>; info fedramp <info@fedramp.gov>  
Subject: [External] Action Needed: MBL Technologies Formal Complaint Notice

(b) (6)

After reviewing MBL Technologies' security assessment report (SAR) for Issio Information System, the FedRAMP PMO identified several fundamental testing accuracy and completeness issues associated with the assessment. Additionally, it was confirmed by A2LA that the assessors utilized for this assessment do not meet the personnel requirements specified in the [A2LA R311 - Specific Requirements: Federal Risk and Authorization Management Program \(FedRAMP\)](#). Please see the enclosed letter for more information related to these concerns.

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Please don't hesitate to reach out if you have any further questions.

Thank You -

--

John Hamilton  
FedRAMP Program Manager of Security Operations

Technology Transformation Service | GSA

(b) (6)

|

[william.hamilton@gsa.gov](mailto:william.hamilton@gsa.gov)

Date: Tue, 7 Jun 2022 11:18 02 -0400  
Message-ID: <CADR9bRnZ+h4w3U4CK32cZkH=esq=7UE64g0m5OE6HhOCimOxw@mail gmail.com>  
Subject: **Re 3PAO Contact List**  
From: John Hamilton <william.hamilton@gsa.gov>  
To: (b) (6) - QQC-C (b) (6) @gsa.gov>  
X-Source-Folder: GSA-2022-001178-william.hamilton@gsa.gov\_0  
X-Email-Hash-MD5: 7b9d07257a59d1e33fe5b057ceb35c2d

Excellent - thanks for taking care of that!

On Tue, Jun 7, 2022 at 11:03 AM (b) (6) - QQC-C (b) (6) @gsa.gov> wrote:  
Hi John - FYI, I had these emails (excluding Lazarus and Digital Forge) added to the list for the upcoming townhall

(b) (6)

On Tue, Jun 7, 2022 at 10:46 AM John Hamilton <william.hamilton@gsa.gov> wrote:  
Hi (b) (6) - Many thanks for providing this list!

Yes, if you could please reach out to Digital Forge again that would be great, it could be they have yet to send us all of the requested information to have their Marketplace page created

Best -  
John

On Fri, Jun 3, 2022 at 9:54 AM (b) (6) - (b) (6) a2la.org> wrote:

Hey all

Please see the table below for the contact information for all current 3PAOs. The text is red for two exceptions – Digital Forge Cyber and Lazarus. Digital Forge was approved back in March but I did not see their listing on the Marketplace. Please let me know if we should reach out to them to follow up. And of course Lazarus – I figured I would include him depending on the timing of these comms.

3PAO	Contact	Email
Accenture Federal Services	(b) (6)	(b) (6)
A-LIGN		
Booz Allen Hamilton		
Burke Consortium		
Cadence		
COACT		
Coalfire		
Controlcase		
Datalock Consulting		
Deloitte		
DOT ESC		
Digital Forge Cyber		
Earthling Security		
Imagine IT		
Excentium		
FTTS		
Fortreum		
GMS		
Ignyte		
InfusionPoints		
ITC		
Jacobs Technology		
KPMG		
Kratos		
Lazarus		
Linford		
Lunadine		
MBL		
MegaplanIT		
Mindpoint group		
NCC Group		
Paragon		
RSM		
Schellman		

SecureIT
Securisea
Sentar
SeraBrynn
Talatek
Tevora
Vaultes
Wilson Consulting



Please let me know if you need anything else.

Thanks!

(b) (6)

A2LA | Cybersecurity Program Manager

Direct: 301 644 3215 | (b) (6) [A2LA.org](http://A2LA.org)

My Hours: 8:00 am - 4 00 pm (ET)

**A2LA Office Hours: 8:00 am - 8:00 pm (ET)**

5202 Presidents Court, Suite 220  
Frederick, MD 21703  
Main Line: 301 644 3248  
[www.A2LA.org](http://www.A2LA.org)



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--  
John Hamilton  
FedRAMP Program Manager of Security Operations  
Technology Transformation Service | GSA  
(b) (6) | [william.hamilton@gsa.gov](mailto:william.hamilton@gsa.gov)



U.S. General Services Administration

**Evan Isaacs**  
Technology Transformation Services  
Program Management Office, FedRAMP

--  
John Hamilton  
FedRAMP Program Manager of Security Operations  
Technology Transformation Service | GSA  
(b) (6) | [william.hamilton@gsa.gov](mailto:william.hamilton@gsa.gov)

Date: Tue, 7 Jun 2022 10:43:55 -0400  
Message-ID: <CADR9bRqgg0728bM0XtAxXA2WTozpQ\_5J9b2LFqqnorJ9ut3Gkg@mail.gmail.com>  
Subject: Re 3PAO Contact List  
From: John Hamilton <william.hamilton@gsa.gov>  
To: (b) (6) - QQC-C <(b) (6) @gsa.gov>  
X-Source-Folder: GSA-2022-001178-william.hamilton@gsa.gov\_0  
X-Email-Hash-MD5: f92e4fec29d33f51a5000202374b8628

Thanks (b) (6) - I think this is a good list that we can use; but please remove the contact from Lazarus Alliance highlighted in red

Best -  
John

On Tue, Jun 7, 2022 at 9:26 AM (b) (6) - QQC-C <(b) (6) @gsa.gov> wrote:  
See below - Evan got this from A2LA! Several of these look like general fedramp@ email boxes, so not sure if we have more of a leadership contact

(b) (6)

----- Forwarded message -----  
From: (b) (6) - QQC-C <(b) (6) @gsa.gov>  
Date: Fri, Jun 3, 2022 at 10:02 AM  
Subject: Fwd: 3PAO Contact List  
To: (b) (6) - QQC-C <(b) (6) @gsa.gov>  
Cc: (b) (6) - QQC-C <(b) (6) @gsa.gov>; (b) (6) - QQC-C <(b) (6) @gsa.gov>

Hi (b) (6)

I believe (b) (6)'s been working with you on the next 3PAO listening session. Is it possible to ensure these names are on the invite list? This is a list we got from A2LA with their main POCs for each 3PAO. I'd expect them all to be on whatever list we use, but this will be a good check.

You can ignore the ones in red for the time being - I'll follow up if they need an invitation once I can confirm.

Let me know if you want to discuss anything.

(b) (6)

----- Forwarded message -----  
From: (b) (6) <(b) (6) a2la.org>  
Date: Fri, Jun 3, 2022 at 9:54 AM  
Subject: 3PAO Contact List  
To: William Hamilton - XAAB <john.hamilton@gsa.gov>; Laurie Southerton <laurie.southerton@gsa.gov>; (b) (6) - TAC-C <(b) (6) @gsa.gov>

Hey all

Please see the table below for the contact information for all current 3PAOs. The text is red for two exceptions – Digital Forge Cyber and Lazarus. Digital Forge was approved back in March but I did not see their listing on the Marketplace. Please let me know if we should reach out to them to follow up. And of course Lazarus – I figured I would include him depending on the timing of these comms.

3PAO	Contact	Email
Accenture Federal Services	(b) (6)	(b) (6)
A-LIGN		
Booz Allen Hamilton		
Burke Consortium		
Cadence		
COACT		
Coalfire		
Controlcase		
Datalock Consulting		
Deloitte		
DOT ESC		
Digital Forge Cyber		
Earthling Security		
Emagine IT		
Excentium		
FITS		
Fortreum		
GMS		
Ignyte		
InfusionPoints		

ITC	<div>(b)(6)</div>
Jacobs Technology	
KPMG	
Kratos	
Lazarus	
Linford	
Lunarline	
MBL	
MegaplanIT	
Mindpoint group	
NCC Group	
Paragon	
RSM	
Schellman	
SecureIT	
Securisea	
Sentar	
SeraBrynn	
Talatek	
Tevora	
Vaultes	
Wilson Consulting	

Please let me know if you need anything else.

Thanks!

(b)(6)

A2LA | Cybersecurity Program Manager

Direct: 301 644 3215 | (b)(6) [A2LA.org](mailto:(b)(6)@A2LA.org)

My Hours: 8:00 am - 4 00 pm (ET)

**A2LA Office Hours: 8:00 am - 8:00 pm (ET)**

5202 Presidents Court, Suite 220  
Frederick, MD 21703  
Main Line: 301 644 3248  
[www.A2LA.org](http://www.A2LA.org)



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U.S. General Services Administration

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**Evan Isaacs**  
Technology Transformation Services  
Program Management Office, FedRAMP




**Bailey Feldman**  
Contractor, FedRAMP PMO Support  
[FedRAMP](#) | [TTS](#) | [GSA](#)  
m: (b)(6)  
e: [bailey.feldman@gsa.gov](mailto:bailey.feldman@gsa.gov)

John Hamilton  
FedRAMP Program Manager of Security Operations  
Technology Transformation Service | GSA  
(b)(6) | [william.hamilton@gsa.gov](mailto:william.hamilton@gsa.gov)

From: Brian Conrad - QQC <brian.conrad@gsa.gov>  
Date: Tue, 14 Jun 2022 16:23:13 -0400  
Message-ID: <CAKrqu1Z=q\_pv4THof4GhWuEDFGZ8qPAG8nUVzAmz16QgHwzrw@mail.gmail.com>  
Subject: Re: Document shared with you "DRAFT MBL Technologies Formal CAP Notice 061422"  
To: William Hamilton - QQC <william.hamilton@gsa.gov>  
X-Source-Folder: GSA-2022-001178-william.hamilton@gsa.gov\_0  
X-Email-Hash-MD5: 909d67b2a2bee70f3774d603570d4c65

Thank you John - I am good with this

R/  
Brian




FedRAMP

**Brian H. Conrad**  
FedRAMP Director (Acting)/Cybersecurity Program Manager  
[FedRAMP](#) | [TTS](#) | [GSA](#)  
m: (b) (6)  
e: [brian.conrad@gsa.gov](mailto:brian.conrad@gsa.gov)  
e: (b) (6) [pentagon.smil.mil](mailto:pentagon.smil.mil)

On Tue, Jun 14, 2022 at 3:11 PM William Hamilton - QQC (via Google Docs) <[drive-shares-dm-noreply@google.com](mailto:drive-shares-dm-noreply@google.com)> wrote:


william.hamilton@gsa.gov shared a document



william.hamilton@gsa.gov has invited you to **edit** the following document:

Hi Brian - Here is a final draft of the MBL Technologies formal CAP notice regarding their poor assessment for Issio. As discussed earlier, MBL used unqualified personnel and provided incomplete / inaccurate assessment deliverables. If you need any other info, just let me know.

Thanks -  
John

 DRAFT\_MBL Technologies Formal CAP Notice\_061422

Open

From: (b) (6) - QQC-C <(b) (6)@gsa.gov>  
Date: Fri, 10 Jun 2022 10:34:14 -0400  
Message-ID: <CAHEOc4ANPVFP32z1wywhbdV\_m0IpiKx-KPZA8xq9YwuMLyMjBA@mail.gmail.com>  
Subject: **Re Issio Gap Review Meeting**  
To: (b) (6)@issio.net>  
Cc: (b) (6)@issio.net>, Cynthia Bergevin - QQC-C <cynthia.bergevin@gsa.gov>, "DeLeo, Martin" <Martin.DeLeo@va.gov>, (b) (6) mbitechnologies.com>, Jennifer Carlson - QQC-C <jennifer.carlson@gsa.gov>, (b) (6) mbitechnologies.com>, "Solomon-Jackson, Charles L." <Charles.Solomon-Jackson@va.gov>, VA FedRAMP PMO <vafedramp@va.gov>, (b) (6) - QQC-C <(b) (6)@gsa.gov>, William Hamilton - QQC <john.hamilton@gsa.gov>, (b) (6) - QQC-C <(b) (6)@gsa.gov>, (b) (6)@issio.net>  
X-Source-Folder: GSA-2022-001178-william.hamilton@gsa.gov\_0  
X-Email-Hash-MD5: 2cf7fb7b2b384120d9c1580f67924841

Thank you for the notice (b) (6). The review of the attestation letter will be underway shortly  
Yours Truly,  
(b) (6)

—  
(b) (6)  
FedRAMP PMO Support (Noblis)  
[FedRAMP](#) | [ITS](#) | [GSA](#)  
(b) (6)@gsa.gov

On Fri, Jun 10, 2022 at 6:15 AM (b) (6)@issio.net wrote:  
Hello,

I am happy say that the updated Attestation Letter has been uploaded to MAX by Eric

We look forward to seeing your final report, and of course, let us know if there is anything else we can help with in the meantime

Best,  
(b) (6)

On Wed, Jun 8, 2022 at 14:07 (b) (6) - QQC-C <(b) (6)@gsa.gov> wrote:  
Good morning,

Thank you for your participation this week in the Gap Review Mtg. Coming out of that conversation, we have mostly *post*-Authorization actions; these will be written up in the final Report with required closure time frames (30 days receiving congrats email, etc.). However, there is one *pre*-Authorization action.

Pre-Authorization Actions:

1. 3PAO: Update the Attestation Letter with discussion and validation of PIV/CAC configuration being in place so that agency customers can use their PIV/CAC cards if desired.

Post- Authorization Actions (3PAO actions to be performed during annual assessment):

1. AC-2: 3PAO: Since Agency confirmed that they started using system post-initial assessment, validate Agency user accounts are in the boundary and are appropriately reflected in the SSP..
2. IA-2(1)
  - a. CSP: Update language regarding the first "hop" into the system and clarify usage of Google Authenticator and Thales hard token. Explicitly state which tool is used as the Authenticator and which is for the Verifier.
  - b. 3PAO: Validate CSP's implementation and use of authenticator(s) and verifier
3. SC-7: 3PAO: Validate that the management and ops environments are on separate subnets, and both were assessed
4. SC-13: 3PAO: Validate the FIPS Validation certificates on crypto module used for MFA verifier

Thank you, and we look forward to the updated Attestation Letter

Yours Truly,  
(b) (6)

—  
(b) (6)  
FedRAMP PMO Support (Noblis)  
[FedRAMP](#) | [ITS](#) | [GSA](#)  
(b) (6)@gsa.gov

On Thu, May 26, 2022 at 5:08 PM (b) (6) - QQC-C <(b) (6)@gsa.gov> wrote:

Awesome, thank you (b) (6). I'll have the invite out shortly  
Yours Truly,  
(b) (6)

—  
(b) (6)  
FedRAMP PMO Support (Noblis)  
[FedRAMP](#) | [ITS](#) | [GSA](#)  
(b) (6)@gsa.gov

On Thu, May 26, 2022 at 4 04 PM (b) (6)@issio.net wrote:  
Hello,

Thank you for the update! We are glad to hear that things are moving along and hope that we can resolve these outstanding concerns and questions quickly

The best time slot for us would be Monday June 6th at 12:00 pm ET

We look forward to meeting with you again soon

Best,  
(b) (6)

On Thu, May 26, 2022 at 14:26 (b) (6) - QQC-C <(b) (6)@gsa.gov> wrote:  
Good afternoon,

We're through most of the Gap Review of the Issio package and have some questions to clarify. There may be updates required prior to authorization, but the goal will be to resolve concerns in discussion and write up their resolution in the report with post-authorization actions.

Unfortunately, we're completely booked up for next week already. Please let me know which of the following times, for one hour, work best for you:

- Monday June 6th at 11am, 12pm, or 1pm ET
- Tuesday June 7th at 10am or 3pm ET

In context, we are nearly through the initial Authorization process:

- Full Package Submission
- Initial Review Phase
- Conduct Review Mtg
- Remediation Phase
- Gap Review Phase: PMO usually takes ~10 days to complete and reach out for a Gap Review Mtg or send the Congratulations Email ← **Issio is currently at this point. We're almost done the Gap Review, and need to answer some questions and address some continuing concerns. If those are answered and addressed in this round of remediation, we will move forward. If not, we will repeat this phase.**
- The Congratulations email will come from PMO Leadership and contain 2 forms, a survey, and a request to check Marketplace service description.
- When those are returned, the Marketplace designation will be changed to **FedRAMP Authorized!**

Thank you, and we look forward to talking with you again soon.

Yours Truly,

(b) (6)

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(b) (6)

FedRAMP PMO Support (Noblis)

[FedRAMP](#) | [TTS](#) | [GSA](#)

(b) (6) [@gsa.gov](#)

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(b) (6)

Issio Solutions  
Information System Security Officer

e: (b) (6) [@issio.net](#)

c: (b) (6)

--

(b) (6)

Issio Solutions  
Information System Security Officer

e: (b) (6) [@issio.net](#)

c: (b) (6)